

Freedom Court Reporting, Inc

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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF TEXAS
3 MARSHALL DIVISION

4 PATTY BEALL, MATTHEW
5 MAXWELL, TALINA MCELHANY AND
6 KELLY HAMPTON, individually
7 and on behalf of all other similarly situated;
8
9 Plaintiffs,

10 -vs-

2:08-cv-422 TJW

11 TYLER TECHNOLOGIES, INC. AND
12 EDP ENTERPRISES, INC.
13
14 Defendants.

15 _____/.

16 DEPOSITION OF JILL MARIE BROWN
17 Taken by the Defendants on the 31st day of August, 2010, at
18 the offices of Bay Harbor Village Hotel, 4000 Main Street,
19 Petoskey, Michigan, at 10:03 a.m.

20 APPEARANCES:

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EXHIBIT 0011

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1 you were going to get was if you were traveling to a client
2 site you could take a family member with you. Expand on
3 that. This is the first time I'm hearing about this one.

4 A. What he told me was, for instance, what the company would do
5 is if -- if I was at a client site and I was staying over
6 the weekend, and instead of normally flying -- have the
7 price of a ticket to fly back and forth, you'd have the
8 ticket anyways, so you could bring a family member down on
9 that ticket and then you would just have to pay for the
10 hotel room.

11 Q. So the company was actually paying for a family member to
12 come travel and stay with you for the weekend if you had to
13 stay at a client site?

14 A. Yes.

15 Q. I see. Was your -- did your -- strike all that.

16 Now let's go back to your job duties as an
17 implementation specialist. Let's do that now. It's a good
18 time.

19 I want you, Ms. Brown, to help me understand what
20 you did as an implementation specialist. First of all, tell
21 me what office you were employed out of. Or which office
22 were you working out of?

23 A. My home office.

24 Q. So you were working from home?

25 A. Yes.

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- 1 Q. You never actually went into a Tyler Technologies office?
- 2 A. Once in a great while.
- 3 Q. Once in a great while would -- give me an estimate. Once a
- 4 month you went there?
- 5 A. Maybe twice a year.
- 6 Q. Which office would you go to?
- 7 A. Plano.
- 8 Q. Plano, Texas?
- 9 A. Yes.
- 10 Q. Was that known as The Software Group in Plano, Tex -- what
- 11 was that office -- I know it was a Tyler Technologies
- 12 office, but what was it previous to Tyler?
- 13 A. I don't know.
- 14 Q. Does the name "The Software Group" ring a bell to you?
- 15 A. Yes.
- 16 Q. What -- what is that to you? What does that mean to you?
- 17 Is that the name of the group?
- 18 A. The division in Tyler.
- 19 Q. And what was the software that you were working on while you
- 20 were an implementation specialist?
- 21 A. Odyssey.
- 22 Q. Odyssey was the name of the software?
- 23 A. Correct.
- 24 Q. Did you work on Odyssey the whole time?
- 25 A. Yes.

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1 Q. So since you worked out of your home, it wasn't like on a
2 daily basis you were going to an actual office at Tyler,
3 right?

4 MS. BAGLEY: Object to the form.

5 THE WITNESS: When I was home, no.

6 BY MS. KHOSRAVI:

7 Q. So I want to understand what -- give me a typical day of you
8 working from home. Not when you were traveling to a client
9 site. I want to understand while you were working from home
10 what duties were you performing, what functions you had. So
11 walk me through a typical day, when you wake up, brush your
12 teeth, get ready, eat your breakfast and then sit in front
13 of your computer. Walk me through that. What were your
14 duties when you were working from home?

15 MS. BAGLEY: Form.

16 BY MS. KHOSRAVI:

17 Q. You may answer the question.

18 A. Working on configuration for clients.

19 Q. Stop there and tell me what configuration means.

20 A. That means they have specific things they wanted entered
21 into the system and actually enter the codes into the system
22 for them.

23 Q. And when you say enter codes into the system, do you mean
24 you got data from that client and you had to enter those
25 data, meaning dates of birth, dates of hire, things of that

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1 sort, or that's not what you're talking about?

2 A. No.

3 Q. What sort of data or codes were you entering?

4 A. For instance, if they had a specific event that they wanted

5 to use, they would tell you what event and the code that

6 they wanted put in so that they could use that event.

7 Q. Let's back up. Let's back up and you tell me when you first
8 became employed by Tyler Technologies as an implementation
9 specialist. You said you started working with the Odyssey
10 software, right?

11 A. Yes.

12 Q. Now, tell me, what were you doing with the Odyssey software?
13 What was your position?

14 MS. BAGLEY: Object to the form.

15 THE WITNESS: Implementation?

16 BY MS. KHOSRAVI:

17 Q. Yeah. Tell me what that is. What -- what does that mean?
18 To me, implementation doesn't mean much. Tell me what you
19 were doing as an implementation specialist.

20 A. When I first started?

21 Q. Yes.

22 MS. BAGLEY: So we're not at the home office
23 anymore?

24 BY MS. KHOSRAVI:

25 Q. When you first started, you were at your home office?

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1 THE WITNESS: A code is just basically allowing
2 you to configure the system to how -- to put your
3 information in, basically, so that -- it -- it's kind of
4 like a . . .

5 BY MS. KHOSRAVI:

6 Q. Can you give me an example of your clients? When -- when
7 you're talking to me about configuration, think of an
8 example where a client said I need you to do X, Y and Z, so
9 configure this, and give me an example of that.

10 A. Okay. On a regular basis, they would enter an event, a note
11 received from the client.

12 Q. Okay.

13 A. Okay. Say that was a regular event they entered on a
14 regular basis.

15 Q. Okay.

16 A. Well, in order for that to go into the computer system, you
17 would have to configure an event that said "note," so that
18 they didn't have to do that every single time. And then
19 when they, on a regular basis, go in to enter note, they hit
20 like three -- three keys and the note pops up, so it's kind
21 of like, you know, just helping them configure the system.

22 Q. So your job was to figure out what events they were going to
23 encounter and then configure the system for them?

24 A. No.

25 MS. BAGLEY: Object to form.

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1 THE WITNESS: They would tell me what events they
2 needed.

3 BY MS. KHOSRAVI:

4 Q. Uh-huh.

5 A. And I would just go in and add that for them.

6 Q. Okay. So you wouldn't know what events they needed unless
7 the clients actually communicate to you what events -- what
8 event they needed?

9 A. Correct.

10 Q. So let's fast-forward just a little bit. So after you --
11 how long did you spend getting trained by another
12 implementation specialist by logging in and watching what he
13 was doing?

14 A. I don't remember.

15 Q. Was it a month?

16 A. It was a combination of -- of the Web-Exes, and then I would
17 go down to Detroit and actually be on the client site. So
18 it wasn't all Web-Exes.

19 Q. Where was your home located? At your current address?

20 A. Yes.

21 Q. Which is in what city, again?

22 A. Alanson.

23 Q. Alanson?

24 A. Yes.

25 Q. And how far of a -- how far away is Alanson from Detroit?

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1 A. It's about four and a half hours, five hours, depending on
2 traffic.

3 Q. Do you remember how often you were driving from your home
4 office to the client site in Detroit during that time?

5 A. I usually flew back and forth.

6 Q. When you were at the client site in Detroit during that time
7 period, was there another implementation specialist there
8 with you or you were on your own?

9 A. There was another implementation specialist there with them.

10 Q. So think and tell me if you remember, when was it that Tyler
11 started sending you to a client site by yourself without
12 another implementation specialist there? When did your
13 training end? February '07, you started working with the
14 company, so think from that date. How long were you getting
15 trained?

16 A. I don't remember.

17 Q. Were you still getting trained in February 2008?

18 A. I don't remember. I don't remember when the other
19 implementation person stopped -- stopped traveling.

20 Q. But there was a time at which point you were the only
21 implementation specialist at a client site, right?

22 A. Yes.

23 Q. You just don't remember when that was?

24 A. No.

25 Q. Do you remember -- I know you don't remember when that

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1 started. Do you remember how long it was that you were
2 going out to a client site by yourself without another
3 implementation specialist?

4 A. No.

5 (Brown Deposition Exhibit Number 3 was marked
6 for identification at 10:39 a.m.)

7 BY MS. KHOSRAVI:

8 Q. Okay. I'm going to hand you now what's been marked as
9 Exhibit Number 3. It's a job description for an
10 implementation specialist. Ms. Brown, take a look at that
11 and review that.

12 MS. BAGLEY: Take your time and read over this.

13 THE WITNESS: (Reviewing document.) Okay.

14 BY MS. KHOSRAVI:

15 Q. Does this job description accurately reflect the duties and
16 responsibilities that you have as an implementation
17 specialist?

18 A. Yes. For the most part.

19 Q. Okay. Now, since you said "for the most part," let's go
20 over this job description so I understand which one of these
21 responsibilities you did have and which one of them you did
22 not have.

23 In the first part under position objective, it
24 says, "The implementation specialist is responsible for
25 delivering on-site training and system setup and business

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1 use for courts and justice software application."

2 Did you provide on-site training for the City of
3 Detroit, was it you said, for courts and justice system?

4 A. Wayne County.

5 Q. Wayne County. Did you provide on-site training for them?

6 A. Yes.

7 Q. Okay. And you provided on-site training for what? For the
8 use of Odyssey?

9 A. Yes.

10 Q. Okay. And this job description says you were also --
11 implementation specialist was also responsible for
12 delivering system setup. Did you do that?

13 A. We performed code entry, if that's what that pertains to.

14 Q. Well, I was going to actually ask you what system setup
15 meant to you.

16 A. Entering codes that the client told us to -- that they
17 wanted. Yes.

18 Q. And this goes back to configuring the software in order to
19 perform the events that the client wanted?

20 A. Yes.

21 Q. So this goes back to the example you were giving me before?

22 A. Yes.

23 Q. Now, the next sentence says, "Implementation specialists
24 work with their colleagues and managers to design, implement
25 and proactively manage a superior software experience for

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1 our clients."

2 Did you work with your managers and your
3 colleagues to design the software Odyssey?

4 A. I don't know about necessarily design it, but configure it.

5 Q. You did configure -- again, configuration meaning you --

6 A. Setting it up for the client.

7 Q. For the client. So you didn't -- you were not actually
8 involved in designing the program other than configuring it?

9 A. Correct.

10 MS. BAGLEY: Object to the form.

11 BY MS. KHOSRAVI:

12 Q. So when you actually started working with a client, the
13 program -- the software was actually purchased by the
14 client?

15 A. Yes.

16 Q. And all you were -- what you were doing was configuring it
17 and setting it up so that the client could actually use it
18 for the purposes that they intended to?

19 A. Correct.

20 Q. Okay. Remember how we were talking about the time period
21 when you were getting trained by another implementation
22 specialist while you watched what they did --

23 A. Yes.

24 Q. -- from home? Now, think back to the first time that you
25 actually went back to a client site. Who told you that,

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1 BY MS. KHOSRAVI:

2 Q. When you were traveling to a client site to actually perform
3 configuration duties, meaning setting up their system to
4 make sure it functions the way they need it to function, did
5 you do anything previous to that to prepare for the
6 configuration?

7 A. Sometimes.

8 Q. And what sort of things would you have to do to prepare for
9 that?

10 A. Review documentation.

11 Q. When you say "review documentation," clients' documents?

12 A. No. Tyler's doc -- software documentation so that you
13 understood how the -- how the system functions.

14 Q. While you were working as a -- as an implementation
15 specialist for Tyler, you said you traveled to the city of
16 Detroit, which was about four and a half hours from your
17 house. Did you travel anywhere else?

18 A. Yes.

19 Q. Where else did you travel?

20 A. I traveled to Kalamazoo.

21 Q. Is Kalamazoo in Michigan?

22 A. Yes. Georgia.

23 Q. The state of Georgia or the city of Georgia?

24 A. The state. I forget which --

25 Q. Okay. That's fine. State of Georgia.

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1 A. -- client it was.

2 Q. Where else did you travel?

3 A. New Mexico, Las Vegas and Miami.

4 Q. And when you were traveling to these states, were you
5 traveling there to configure and train the clients on
6 Odyssey software only?

7 A. I think --

8 MS. BAGLEY: Object to the form.

9 THE WITNESS: It was Odyssey software only, but it
10 wasn't just training. Some of them were Go-Lives.

11 BY MS. KHOSRAVI:

12 Q. Some of them were configuration?

13 A. Yes.

14 Q. But I think what I'm trying to understand is the Odyssey
15 software was the only software you worked with, or, no, you
16 worked with other softwares, as well?

17 A. No. Just Odyssey.

18 Q. Just Odyssey. And when you were in those other states --
19 Georgia, New Mexico, Las Vegas -- were you working with the
20 city's courts' offices again?

21 A. It -- it's county. County courts.

22 Q. County courts. So you were only working with the county
23 courts or did you ever work with their school systems or --

24 A. No. Just the county.

25 Q. Just the county.

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1 engaged in; what they were doing?

2 A. No. Not all of the time. Sometimes, I guess. I
3 don't . . .

4 Q. Sometimes you knew that because you guys were working
5 together on a project?

6 A. Sometimes. Sometimes just through conversation you find out
7 someone's working on something. But, I mean, not on a
8 regular basis. I . . .

9 Q. Go back to the job description I handed you, which was
10 Exhibit Number 3. Under principal duties, bullet point --
11 the third bullet point, "Create user documentation when
12 required," did you do that, that function?

13 A. Yes.

14 Q. And tell me what that means.

15 A. If the client wanted a simplified version of our manual, we
16 would -- we could just take screenshots off of our manual
17 and put it into something a little more simplified that
18 wasn't as lengthy, kind of a little cheat sheet for them.

19 Q. Now, go under the section where it says scope and impact.
20 The second sentence says -- it talks about implementation
21 specialists' job responsibilities. It says, "They do
22 everything from conversion, checkout, fit analysis." Do you
23 see that?

24 A. Yes.

25 Q. What is -- did you do that?

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1 A. I'm trying to remember as an implementation specialist --
2 yes, I did.

3 Q. Tell me what fit analysis is.

4 A. You basically sit there and listen to the project manager
5 talk with the client and the client's telling them what
6 their business process is, and you enter in a code to show
7 them and -- so that the project manager can show them if
8 that will work to meet their business process.

9 Q. So you're not actually creating that code or entering it,
10 you're sitting there observing the project manager do it?
11 I'm trying to understand --

12 A. No.

13 Q. Yeah.

14 A. The project manager is in charge and directs the process,
15 and the client is telling the project manager, "This is how
16 we do this business process." And the project manager says,
17 "Okay. You know, Jill, enter the code to show them how that
18 would be done." So you would enter the code and the client
19 would see how -- how that would work for their business
20 process --

21 Q. So is that different from configuration?

22 A. No, not really.

23 Q. So fit analysis is the same thing as configuration?

24 A. It's similar.

25 Q. In what way is it different?

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1 A. Fit analysis is a process of helping the client figure out
2 how the system functions and how it's going to fit their
3 needs with their business processes and --

4 Q. Feel free to think of an example like you did before because
5 that helped. So you can give me an example to differentiate
6 the two for me.

7 A. The client says they need to come up with a way to track
8 certain events that they enter in, so the project manager
9 will -- will have you enter in a code and show the client
10 that, you know, you have this option, you can pull this up,
11 or, you know, maybe you can -- there's this option that will
12 give you the same results, you know, whatever works best for
13 your business processes.

14 Q. And how do you know what codes you're entering? How do you
15 know what code you're entering? You kept saying the project
16 manager would say, "Enter the code."

17 A. When you're entering a code and you're just doing a
18 demonstration, --

19 Q. Uh-huh.

20 A. -- you just enter -- you can enter whatever code just to
21 kind of give an example. You would just enter like an
22 example code to show them this is what it can do, here's
23 this option, here's this option.

24 Q. So a code is not like a computer program?

25 A. No.

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1 troubleshooting during the Go-Live phase; is that right?

2 A. Yes.

3 MS. BAGLEY: Form.

4 BY MS. KHOSRAVI:

5 Q. Were you engaged in any other functions or processes that

6 I'm missing that I haven't discussed with you today?

7 A. The conversion.

8 Q. Conversion. Tell me what that is. I haven't talked about

9 that today.

10 A. That's when the data from the old system gets processed to

11 fit into the new system, and we don't actually do the

12 conversion, but we help review the data to make sure that

13 the information that's coming through is put in the right

14 spot, so to speak.

15 Q. Now, you said several times we don't do this or we do this.

16 I want to know what Jill Brown, as an implementation

17 specialist, did. So did you, Jill Brown, ever engage in

18 actually converting their old data to the new data? Did you

19 personally engage in conversion?

20 A. No, not as an implementation specialist.

21 Q. Did you ever, during your --

22 A. No.

23 Q. -- employment with Tyler, engage in conversion?

24 A. Not the actual process of converting.

25 Q. What process of converting were you engaged in?

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1 to know what else you were engaged in. What else were you
2 doing while you were working for Tyler at home, during your
3 business hours at home?

4 A. Those were the majority of the things; you know,
5 documentation, data conversion, reviews --

6 Q. Data conversion, reviews. Okay.

7 A. Web-Exes with the client, configuration.

8 Q. Okay. Now, other than the implementation specialist
9 position that you held with Tyler, at some point, you also
10 held the position of a project manager; is that right?

11 A. In conjunction with the implementation --

12 Q. So you were -- at some point during your employment with
13 Tyler, you were functioning as an implementation specialist,
14 and you also functioned as a project manager at the same
15 time?

16 A. Yes.

17 Q. Okay. How long were you performing that function? I'm
18 sorry. Let me back up. How long were you performing both
19 functions of implementation specialist and project manager?

20 A. It was only project manager for one client.

21 Q. Which client was that?

22 A. Kalamazoo.

23 Q. Kalamazoo. What does that mean? Is that the city?

24 A. It's county.

25 Q. It's a county.

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1 A. Yes.

2 Q. In -- in where?

3 A. Michigan.

4 Q. In Michigan. So for -- for the Kalamazoo project, you were
5 functioning as implementation specialist and the project
6 manager?

7 A. Yes.

8 Q. Just for that project?

9 A. Yes.

10 Q. Do you remember the duration, how long you were actually the
11 project manager?

12 A. It was for that project, which lasted, I think, for about
13 a -- a little over a year, maybe.

14 Q. Do you remember when it was that you took over the position
15 of the project manager, as well as implementation
16 specialist?

17 A. I believe it was June of '08.

18 Q. June of '08. Did your salary increase as a result of you
19 having the additional responsibilities of a project manager?

20 A. I was given a project stipend, or whatever they call it,
21 for --

22 Q. Was it also called an assignment premium? Does that mean
23 something to you?

24 A. Yes. That sounds right.

25 Q. So they were giving you about \$650.00 in addition to your

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1 salary for your additional duties as a project manager?

2 A. Yes.

3 Q. So from June 2008 until the project ended, the Kalamazoo
4 project ended, you were project manager?

5 A. Not just project manager. I was doing both project --

6 Q. I'm sorry.

7 A. -- management and implementation.

8 Q. You're right. You're right. So from June 2008 until the
9 Kalamazoo project ended, you were functioning as both an
10 implementation specialist and a project manager?

11 A. Correct.

12 Q. When did the Kalamazoo project end? When did your duties as
13 a project manager end? Do you remember that?

14 A. July of '09.

15 Q. Would it have happened July or perhaps August of 2009?

16 A. That could be. Yes.

17 Q. Okay. And then once you -- once you were no longer
18 performing the functions of a project manager, you also were
19 no longer receiving the \$650.00 additional salary, correct?

20 A. Correct.

21 Q. And that 650 was per month, correct?

22 A. Yes. I believe that's what it was.

23 Q. Now, why do you say -- why do you say -- you said I was
24 performing both the functions as an implementation
25 specialist and a project manager. Were they different

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1 functions?

2 A. Yes.

3 Q. How was a project manager position that you also took on

4 different than an implementation specialist's position?

5 A. The project manager is responsible for more of the

6 administrative functions with the client, more of the

7 hands-on interaction with the client. You're more

8 responsible for the client relationship.

9 Q. As a project manager, were you leading a team of

10 implementation specialists to finish the project?

11 A. I did have a team come in and help for Go-Live.

12 Q. But as a project manager, you were managing the Kalamazoo --

13 A. Kalamazoo.

14 Q. -- Kalamazoo project, right?

15 A. Yes.

16 Q. And in being the project manager for the -- I can't say that

17 word -- Kalamazoo project, did you have a team of

18 implementation specialists that you were coordinating with

19 and leading in finishing that project?

20 A. No. Kalamazoo did a lot of their own implementation work

21 because this was their second phase of the project and they

22 pretty much had a good grasp of how to configure the system

23 so they pretty much handled the majority of that.

24 Q. And by you saying that, it means they had already used the

25 Odyssey software before?

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1 A. Correct.

2 Q. Were they upgrading?

3 A. They were -- we do the project in phases. They had already
4 implemented criminal.

5 Q. So they had gone live already?

6 A. They had gone live, and they were working on implementing
7 civil.

8 Q. And because they had done -- they had gone live with the
9 criminal phase of Odyssey, they did not need an
10 implementation specialist on-site to -- to do what? They
11 didn't need an implementation specialist to train them?
12 They already knew how the system worked?

13 A. Correct.

14 Q. What about configuration? Who helped them with the
15 configuration?

16 A. They did the configuration.

17 Q. Okay. So tell me, as a project manager on Kalamazoo, what
18 was your role? Did you -- you didn't have any
19 implementation specialists working -- working underneath
20 you?

21 A. If I remember correctly, the only time I had implementation
22 people in was for the Go-Lives.

23 Q. You had implementation specialists on the client site when
24 they were going live with the civil phase of the Odyssey --

25 A. Civil and criminal.

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1 feeling for what was expected of you as a project manager?

2 A. Just kind of, yeah, watched.

3 Q. And so once you shadowed that other project manager and you
4 started doing -- performing the function of a project
5 manager, you walk in, you're now having to perform as a
6 project manager, what -- what additional duties and
7 responsibilities did you have besides the configuration work
8 that you were doing and the training work that you were
9 doing?

10 MS. BAGLEY: Form.

11 THE WITNESS: Project managers don't do
12 configuration.

13 BY MS. KHOSRAVI:

14 Q. So at that time when you were working as a project manager,
15 were you still configuring because you were implementation
16 specialist or, no, that function had gone away for the time
17 being?

18 A. For the time being -- I mean, if I was doing implementation
19 work for the client, I would bill them for implementation
20 work --

21 Q. From Kalamazoo?

22 A. Yes.

23 Q. Okay.

24 A. If I was doing project management work, I would bill for
25 project management.

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1 Q. How did you know certain work that you were doing was
2 classified as project manager work and how did you know this
3 work that I'm doing now is implementation specialist work?

4 A. Because coding, doing the -- the -- adding codes in is -- is
5 implementation type of work. Keeping track of client
6 billing and that sort of thing is project management.

7 Q. And when you say keeping track of clients' billing, expand
8 so I know what you're talking about. So as a project
9 manager, your -- part of your job was to see how many hours
10 you had worked as an implementation specialist?

11 A. If the client has a project, say they want a -- a special
12 enhancement, that they want the software to work a specific
13 way, --

14 Q. Okay.

15 A. -- and the software, as a core package, does not work that
16 way, so you have to sit down with the client and you have to
17 actually write up what -- how they want the software to
18 work. And then you have to take it and present it to the
19 developers and get an estimate of how many development hours
20 it's going to take to actually write software code to change
21 the software to work the way that they want it to work.
22 That's part of the project management roles. I'm trying to
23 think. Their -- their budget, keeping track of -- oh. If
24 development takes a project, they work six hours on it, you
25 have to, every week, look at -- at the hours that are billed

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1 towards certain projects for the client so that you can keep
2 track of their budget and their billing.

3 Q. And this was all done in your capacity as a project manager?

4 A. As a project manager, yes.

5 Q. Were you managing any implementation specialists as a
6 project manager?

7 A. When they were on-site.

8 Q. You were actually managing them?

9 A. Yes.

10 Q. Okay. How many implementation specialists were you managing
11 during the time period that you were functioning as a
12 project manager?

13 A. It was just when they were on-site, and then it was
14 basically telling them what time we were meeting, and I
15 think the most was two at a time, I had two on-site at a
16 time.

17 Q. And when you were meeting with them, what -- what happened
18 at these meetings? Were you meeting them in your efforts to
19 finish the configuration or -- you tell me what you were
20 doing at these conference calls that you were having with
21 your implementation specialists.

22 A. It was when they were on-site, we would have meetings and we
23 would talk about the Go-Live. Any issues the implementation
24 people have they always would escalate to the project
25 manager, so I -- as PM, as project manager, I made up cards,

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- 1 OFM." Do you see that?
- 2 A. Yes.
- 3 Q. What is OFM?
- 4 A. That's part of Odyssey.
- 5 Q. What does it stand for?
- 6 A. It's -- it's part of -- it's Odyssey Financial Manager.
- 7 Q. So you're saying here that you became more comfortable
- 8 configuring the Odyssey Financial Manager?
- 9 A. Yes.
- 10 Q. And this is something that the courts still used?
- 11 A. Yes. That's a -- Odyssey has different components to it.
- 12 Q. Okay.
- 13 A. And Odyssey Financial Manager is a component of the Odyssey
- 14 software.
- 15 Q. Number 3, you wrote, "As I created documentation that is not
- 16 too client specific, and that I felt may be useful to
- 17 others, I shared it with management for determination of its
- 18 usefulness." Do you see that?
- 19 A. Yes.
- 20 Q. Is that an accurate statement?
- 21 A. Yes.
- 22 Q. And tell me in your own words, describe to me documentation,
- 23 what is that -- what is it that you did? You created what
- 24 documentation?
- 25 A. The -- the client would ask for cheat sheets and you would

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1 take, out of the manuals, screenshots. And if they asked
2 for something specific, you would put it in there. And if
3 it wasn't too specific for a client, I would share that
4 information with management.

5 Q. So they could just give it -- give that cheat sheet to other
6 clients?

7 A. Yes.

8 Q. Okay. I want you to read Number 2 under "Personal
9 Professional Growth Goals." Read that whole paragraph that
10 you wrote.

11 A. (Witness complied.)

12 Q. Do you agree with the statements that you made there?

13 A. Yes.

14 Q. It says, "My goal was to try and experience and perform some
15 of those processes, such as Configuration Workshops, Forms
16 Workshops, et cetera." Are you saying that because of your
17 dedication to Detroit, you missed out on a lot of
18 implementation processes from the beginning to end? I'm
19 trying to understand, you weren't getting training or
20 whether -- tell me in your own words what you were telling
21 them in this paragraph.

22 A. Workshops are -- a forms workshop is -- is just like -- like
23 doing training with a client on -- on how to add forms into
24 the system. And because, when I came on board with Tyler,
25 Detroit was already through that process, and so I didn't

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1 that you worked?

2 A. Any additional time sheets that reflect hours that I didn't
3 put in to the TimeConsultant.

4 Q. You were telling me before the times when you actually
5 traveled to a client site. Do you remember that
6 conversation where you mentioned Georgia, you mentioned
7 Detroit, you mentioned Las Vegas?

8 A. Yes.

9 Q. You mentioned who else?

10 A. Miami.

11 Q. Miami. Where else did you go? New Mexico?

12 A. New Mexico.

13 Q. Where else?

14 A. Kalamazoo.

15 Q. Kalamazoo in Michigan. Where else?

16 A. Minnesota.

17 Q. Anywhere else?

18 A. I was on a client site in Texas.

19 Q. Anywhere else?

20 A. Not that I can think of. I think that's it.

21 Q. So that's eight -- eight times that you went to a client
22 site; is that right?

23 MS. BAGLEY: Object to form.

24 THE WITNESS: That's eight clients that I worked
25 on, not necessarily the number of times that I was at a

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1 different site.

2 BY MS. KHOSRAVI:

3 Q. So some of the clients you might have visited or traveled to
4 their site during the project, during the life of the
5 project, right?

6 A. Correct.

7 Q. So for these eight particular locations or clients that you
8 worked for, do you remember how many times you visited each
9 one of their sites, or you don't remember that?

10 A. I don't remember that.

11 Q. So unless you were traveling to the -- to these eight
12 particular client sites, if you weren't on their sites, you
13 were working from your home office; is that right?

14 A. That's correct. Unless I was on vacation.

15 Q. And you mentioned earlier that you also had an opportunity
16 to actually go to Tyler's offices in Plano, right?

17 A. Yes.

18 Q. How many times was that? Was it just once that you went
19 there?

20 A. A couple times a year, I think.

21 Q. You might have testified to this and I'm sorry, I just don't
22 remember. What was the purpose of that visit? What would
23 you do when you went down to Plano?

24 A. Meetings. For team meetings. That was pretty -- team
25 meetings or -- or company functions.

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1 CERTIFICATE OF NOTARY

2 STATE OF MICHIGAN)

3) SS.

4 COUNTY OF CHEBOYGAN)

5
6 I, Kristine K. Grigsby, a Notary Public in and for the

7 above county and state, do hereby certify that the above

8 deposition was taken before me at the time and place

9 hereinbefore set forth; that the witness was by me first

10 duly sworn to testify to the truth, and nothing but the

11 truth; that the foregoing questions asked and answers made

12 by the witness were duly recorded by me stenographically and

13 reduced to computer transcription; that this is a true, full

14 and correct transcript of my stenographic notes so taken;

15 and that I am not related to, nor of counsel to either party

16 nor interested in the event of this case.
17
18
19
20

21 KRISTINE K. GRIGSBY, CSR-4834, RPR

22 Notary Public,

23 Cheboygan County, Michigan

24 (Acting in Emmet County)

25 My Commission Expires: April 23, 2011